

Appl. No.: 09/675,920  
Reply to Final Office Action of June 30, 2005

#### REMARKS

Claims 1-18 are currently pending in the present application. Claims 1, 2, 4, 5, 7, 8, and 10 have been amended. Support for the amendments may be found on pages 6-8 and FIG. 1 of the specification. No new matter has been added. Reexamination and reconsideration of the application are respectfully requested.

#### REJECTION OF CLAIMS 8-9 UNDER 35 U.S.C. 102(e)

Claims 8-9 are rejected under 35 U.S.C. 102(e) for the reasons set forth on pages 2-3 of the Action. Specifically, claims 5-7 are rejected under 35 U.S.C. 102(e) as being anticipated by Young No (U.S. Pat. No. 6,587,140, hereinafter referred to as "No" or "the No reference").

The rejections under 35 U.S.C. 102(e) are respectfully traversed, at least insofar as applied to the amended claims, and reconsideration and reexamination of the application is respectfully requested for the reasons set forth herein below.

FIG. 1 and FIG. 2, elements 5, 50, 83, 76, and 92, and Column 4, lines 38-45, of the No reference are cited as teaching the removable PC card as claimed. It is respectfully submitted that the No reference fails to teach or suggest the invention as claimed.

Specifically, the No reference fails to teach or suggest inter alia the following claim limitations: "wherein a defective printer controller may be replaced by an operational printer controller or an out-dated printer controller may be upgraded with a new printer controller by removing the PC card with the defective or old printer

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controller from the laser office machine and by inserting a new PC card with the operational or new printer controller into the laser office machine," as claimed in claim 8.

One aspect of the invention is to provide a removable PC card that includes a printer controller that allows the user to be able to easily access, replace, or upgrade the printer controller. Claim 8 has been amended to clarify and recite this aspect. Unfortunately, this is not possible with prior art printer system configurations. (see Background section of application). This aspect is neither taught nor suggested by the No reference.

In view of the foregoing, it is respectfully submitted that the No reference, whether alone or in combination, fails to teach or suggest the removable PC card as claimed. Accordingly, it is respectfully requested that the claim rejections under 35 U.S.C. Section 102(e) be withdrawn.

REJECTION OF CLAIMS 5-7 & 18 UNDER 35 U.S.C. 103(a)

Claims 5-7 & 18 are rejected under 35 U.S.C. 103(a) for the reasons set forth on pages 3-4 of the Action. Specifically, claims 5-7 & 18 are rejected under 35 U.S.C. 103(a) as being unpatentable over Young No (U.S. Pat. No. 6,587,140) in view of Murata (U.S. Pat. No. 6,606,161), hereinafter referred to as Murata or Murata reference.

The rejections under 35 U.S.C. 103(a) are respectfully traversed, at least insofar as applied to the amended claims, and reconsideration and reexamination of the application are respectfully requested for the reasons set forth herein below.

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Specifically, the No reference, whether alone or in combination with Murata, fails to teach or suggest inter alia the following claim limitations: "wherein the office machine requires the PC card with printer controller to be coupled thereto to render images; and wherein a defective printer controller may be replaced by an operational printer controller or an out-dated printer controller may be upgraded with a new printer controller by removing the PC card with the defective or old printer controller from the office machine and by inserting a new PC card with the operational or new printer controller into the office machine," as claimed in claim 5.

Neither No nor Murata fairly teach or suggest an efficient replacement or upgrade of printer controller as claimed. Furthermore, as argued previously, No's microprocessor 92 (see FIG. 2) does not fairly teach or suggest the printer controller as claimed. Processor 92 of Tsukamoto is described as performing the following functions: 1) implementing the JPEG compression algorithm (col. 4, lines 35-37), and 2) converting data stream received from imaging unit 33 into printer instructions (col. 4, lines 40-42).

In contrast, the printer controller, which is known by those of ordinary skill in the art, and described in the Background section, performs functions required by the laser print engine. It is respectfully submitted that processor 92 of No is very different in construction, operation and function than the printer controller as claimed. In this regard, claim 5 has been amended to recite printer controller instead of "formatter" to clarify that the printer controller is the same component that in the prior art is housed in the printer enclosure and is needed by the print engine to render images.

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In view of the foregoing, it is respectfully submitted that the No reference, whether alone or in combination with the Murata reference, fails to teach or suggest the office machine as claimed. Accordingly, it is respectfully requested that the claim rejections under 35 U.S.C. Section 103(a) be withdrawn.

REJECTION OF CLAIMS 1, 16 & 17 UNDER 35 U.S.C. 103(a)

Claims 1, 16 & 17 are rejected under 35 U.S.C. 103(a) for the reasons set forth on pages 4-6 of the Action. Specifically, claims 1, 16 & 17 are rejected under 35 U.S.C. 103(a) as being unpatentable over Tsukamoto et al. (U.S. Pat. No. 6,801,328, hereinafter referred to as "Tsukamoto" or "the Tsukamoto reference") in view of Young No (U.S. Pat. No. 6,587,140).

The rejections under 35 U.S.C. 103(a) are respectfully traversed, at least insofar as applied to the amended claims, and reconsideration and reexamination of the application are respectfully requested for the reasons set forth herein below.

Specifically, the Tsukamoto reference, whether alone or in combination, fails to teach or suggest inter alia the following claim limitations: "wherein the office machine requires the PC card with printer controller to be coupled thereto to render images; and wherein the printer controller may be replaced or upgraded by a user without intervention of the manufacturer of the office machine," as claimed in claim 1.

The apparatus of Tsukamoto includes a recording portion 110 that performs the printing. Tsukamoto states, "The recording portion 110 comprises a DMA controller, a general-purpose IC and a thermal head or an ink jet head, the recording portion 110 being arranged to sequentially take data stored in the RAM 103 under control of the

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CPU 101 to print out it on B4 or A4 recording paper as a hard copy.” However, it is noted that the recording portion 110 cannot be easily replace or upgrade by a user without intervention of the manufacturer of the apparatus, as claimed. Modem card 115, cellular interface card 117, and printer interface card 116 are shown as removable cards, but none of these cards includes a printer controller as claimed.

Moreover, it is noted that none of these cards is needed for the apparatus to print as claimed. In other words, the apparatus of Tsukamoto does not require any of the cards 115, 116, 117 to accomplish the printing function.

In view of the foregoing, it is respectfully submitted that the Tsukamoto reference, whether alone or in combination with the No reference, fails to teach or suggest the invention as claimed. Accordingly, it is respectfully requested that the claim rejections under 35 U.S.C. Section 103(a) be withdrawn.

Claims 2-4, 10-14 are rejected under 35 U.S.C. 103(a) for the reasons set forth on pages 5-9 of the Action. Specifically, claims 2-4, 10-14 are rejected under 35 U.S.C. 103(a) as being unpatentable over Tsukamoto et al. (U.S. Pat. No. 6,801,328, hereinafter referred to as “Tsukamoto” or “the Tsukamoto reference”) and Young No (U.S. Pat. No. 6,587,140) and in view of Benjamin et al. (U.S. Pat. No. 6,113,208, hereinafter referred to as “Benjamin” or “the Benjamin reference”).

The rejections under 35 U.S.C. 103(a) are respectfully traversed, and reconsideration and reexamination of the application are respectfully requested for the reasons set forth herein below.

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Benjamin is cited for teaching an automatic update module that downloads a printer driver from a Website as claimed. Specifically, col. 3, lines 50-67 and col. 4, lines 1-40 are cited for this teaching. It is respectfully submitted that the combination of Tsukamoto and No fails to teach or suggest the invention as claimed for the same reasons as advanced previously. Benjamin does not cure the deficiencies of the Tsukamoto and No references.

In view of the foregoing, it is respectfully submitted that the Tsukamoto reference, whether alone or in combination with the No reference and the Benjamin reference, fails to teach or suggest the invention as claimed. Accordingly, it is respectfully requested that the claim rejections under 35 U.S.C. Section 103(a) be withdrawn.

Claims 15 is rejected under 35 U.S.C. 103(a) for the reasons set forth on page 9 of the Action. Specifically, claims 15 is rejected under 35 U.S.C. 103(a) as being unpatentable over Tsukamoto, No, Benjamin and further in view of Austin (U.S. Pat. No. 6,665,089, hereinafter referred to as "Austin" or "the Austin reference").

Austin is cited for teaching performing a cyclic redundancy check. Specifically, FIG. 18, col. 12, lines 60-67 and col. 13, lines 1-30 are cited for this teaching. It is respectfully submitted that the combination of Tsukamoto, No, and Benjamin fails to teach or suggest the invention as claimed for the same reasons as advanced previously. Austin does not cure the deficiencies of Tsukamoto, No and Benjamin.

In view of the foregoing, it is respectfully submitted that the Tsukamoto reference, whether alone or in combination with the No reference, Benjamin reference,

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and the Austin reference, fails to teach or suggest the claimed invention. Accordingly, it is respectfully requested that the claim rejections under 35 U.S.C. Section 103(a) be withdrawn.

It is respectfully submitted that the references are improperly combined. It appears that the Action uses improper hindsight to select components or elements from the different references to arrive at the claimed invention.

Assuming arguendo that the different components of the different references may be combined in the manner outlined in the Action, the Federal Circuit has stated, "The mere fact that the prior art may be modified in the manner suggested by the Examiner does not make the modification obvious unless the prior art suggested the desirability of the modification." In re Fritch, 972 F.2d 1260, 23 USPQ 2d 1780, 1783-84 (Fed. Cir. 1992) [emphasis added].

Consequently, it appears that the current patent application has been improperly used as a basis for the motivation to combine or modify the components selected from the cited references (e.g., Tsukamoto, No, Murata, Benjamin, and Austin) to arrive at the claimed invention. Stated differently, the proposed combination of the cited references appear to be based on hindsight since the cited references do not teach or suggest a motivation to combine the respective elements of each reference in the manner proposed by the Action.

The Federal Circuit has held, "The combination of elements from non-analogous sources, in a manner that reconstructs the applicant's invention only with the benefit of hindsight, is insufficient to present a prima facie case of obviousness.

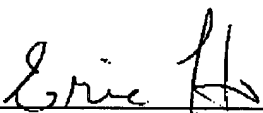
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There must be some reason, suggestion, or motivation found in the prior art whereby a person of ordinary skill in the field of the invention would make the combination. That knowledge can not come from the applicant's invention itself." In re Oetiker, 977 F.2d 1443, 24 USPQ 2d 1443, 1446 (Fed. Cir. 1992)

Accordingly, it is respectfully requested that the rejections of the claims under 35 U.S.C. 103(a) be withdrawn.

For all the reasons advanced above, it is respectfully submitted that the application is in condition for allowance. Reexamination and reconsideration of the pending claims are requested, and allowance is earnestly solicited at an early date. The Examiner is invited to telephone the undersigned if the Examiner has any suggestions, thoughts or comments, which might expedite the prosecution of this case.

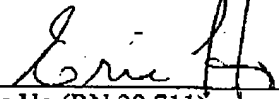
Respectfully submitted,



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I hereby certify that this paper is being facsimile transmitted to the U.S. Patent and Trademark Office (fax no.: 703-872-9306) on the date below.

  
Eric Ho (RN 39,711)

Aug. 30, 2005  
(Date)